

EXHIBIT 51

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FLATWORLD INTERACTIVES,
LLC,

Plaintiff,

vs.

Case No.

APPLE, INC.,

Defendant.

****CONFIDENTIAL, ATTORNEYS' EYES ONLY****

DEPOSITION OF
MICHAEL J. OSSIP

TAKEN ON
TUESDAY, MAY 28, 2013
9:30 A.M.

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1701 Market Street
Philadelphia, PA

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(It is hereby stipulated and agreed by and
counsel for the respective parties that the sealing,
and certification are waived; and that all objections,
except as to the form of the question, are reserved
time of trial.)

1 e-mail to Mark Carlson?

2 A. No.

3 Q. And am I correct that your firm views the
4 portion of that that was redacted as intrafirm
5 privilege?

6 A. Yes.

7 Q. And I take it that Morgan Lewis is not
8 waiving any intrafirm privilege, correct?

9 A. We engaged in a limited waiver in response
10 to the Apple subpoena, but that wouldn't have
11 covered this, no.

12 Q. As a general matter, have you -- well,
13 you've interviewed Mr. McAleese, correct?

14 A. I've spoken to him several times. I guess
15 you could refer to it as an interview.

16 Q. Have you demanded that he tell you all
17 possible Apple information that he may know of?

18 A. I don't know that I've asked that question
19 in that manner, no.

20 Q. Okay. Have you interviewed all Apple
21 timekeepers at Morgan Lewis regarding communications
22 that they may have had with John McAleese concerning
23 this?

24 A. No.

25 Q. Do you know who Dan Golub is?

1 A. Golub, G-O-L-U-B.

2 Q. Golub.

3 A. He is a former partner of the firm.

4 Q. Have you interviewed Mr. Golub regarding
5 communications that he had with Mr. McAleese in
6 2007?

7 A. No.

8 Q. And you've indicated that you searched
9 John McAleese's e-mails for responsive materials,
10 correct?

11 A. At my request, it was done, yes.

12 Q. Did you include the term "iPhone" in your
13 search of John's e-mails?

14 A. I don't know. I believe yes. But, you
15 know, I -- I relied on our e-data and e-discovery
16 individuals to come up with the -- with the
17 keywords, but I can't say for certain.

18 Q. Okay. Can you -- well, let's start -- can
19 you tell me what hardware Mr. McAleese was issued by
20 Morgan Lewis from 2006 to the present? Let's start
21 with laptops.

22 A. I can't -- I cannot tell you that off the
23 top of my head, no.

24 Q. Do you know if Mr. McAleese was issued a
25 firm laptop? Well, was there any hardware that Mr.